

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	3:20-CR-87
	:	
v.	:	(Judge Mariani)
	:	
CORBIN KAUFFMAN	:	(Electronically Filed)

**CONCURRED-IN MOTION FOR JUDICIAL APPROVAL
TO CHANGE ADDRESS WHILE ON PRE-TRIAL RELEASE**

AND NOW comes the Defendant, Corbin Kauffman, by his attorney, Christopher Opiel, Esq., and files the following Concurred-in Motion for Judicial Approval to Change Address While on Pre-Trial Release. In support thereof, it is averred as follows:

1. On April 1, 2019, the Defendant was arrested and charged with transmission in interstate commerce of any threat to injure the person of another in violation of 18 U.S.C. § 875(c).
2. On April 4, 2019, the Defendant appeared for a Detention Hearing, and the Court released the Defendant subject to the Order Setting Conditions of Release. (Doc. 10).
3. Paragraph (7)(f) in the Order Setting Conditions of Release it states that the Defendants “[t]ravel [is] restricted to the Middle District of PA unless otherwise approved by pretrial services officer.” (Doc. 10).

4. On October 25, 2019, an Order was entered modifying paragraph (7)(s) of the Order Setting Conditions of Release in order to allow the Defendant to obtain and use a cell phone under certain conditions. (Doc. 28).

5. On March 27, 2020, an Information was filed charging the Defendant with one (1) count of the transmission in interstate commerce of any threat to injure the person of another in violation of 18 U.S.C. § 875(c). (Doc. 39).

6. Also, on March 27, 2020, an executed Plea Agreement for a plea to the one (1) count Information was filed to the docket. (Doc. 41).

7. Since the Defendant has been released from custody on April 4, 2019 the Defendant has resided within the Middle District of Pennsylvania in Lehigh, PA 18235.

8. The Defendant's father was diagnosed with cancer and recently had a kidney transplant.

9. The Defendant would like to change his residence in order to live with his parents within the Middle District of Pennsylvania in Etters, PA 17319, in order to help out due to his father's condition.

10. Undersigned Counsel spoke with U.S. Probation Officer Maureen A. Harrity-Jones concerning the Defendants change of address, and USPO Harrity-Jones indicated that it was recommended that prior to the change of address, judicial approval be granted due to the nature of the charge, and the fact that

previous to the drafting of this Motion there were firearms located at the Defendant's parents' residence. Additionally, Undersigned Counsel was notified that the Defendant's supervision would have to be transferred to the Harrisburg – U.S. Probation Office.

11. Undersigned Counsel has been informed that all the firearms at the Defendant's parents' house have been removed from the residence. A notarized letter and list of the firearms signifying the removal of the firearms are jointly attached to this Motion as Exhibit A.

12. Undersigned Counsel has discussed this Motion with USPO Maureen A. Harrity-Jones, and USPO Harrity-Jones has indicated that she concurs in this Motion.

13. Undersigned Counsel contacted AUSA Sean A. Camoni regarding this Motion and AUSA Camoni indicated that the government is in concurrence with said Motion.

WHEREFORE, the Defendant, Corbin Kauffman, respectfully requests that this Honorable Court enter an order granting judicial approval for the Defendant to change his residence and move to his parents' house in Etters, PA 17319.

Respectfully submitted,

Date: April 22, 2020

/s/ Christopher Opiel
Christopher Opiel, Esq.
Attorney ID# PA318776

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CERTIFICATE OF SERVICE

I, Christopher Opiel, Esq., do hereby certify that this document, the foregoing **Concurred-In Motion for Judicial Approval to Change Address while on Pre-Trial Release** filed electronically through the ECF system will be sent to the registered Participants as identified on the Notice of Electronic Filing, including the following:

Sean A. Camoni, Esquire
Assistant United States Attorney

Date: April 22, 2020

/s/ Christopher Opiel
Christopher Opiel, Esq.

EXHIBIT A

Chris Opiel, Esq.
Opinel Law
88 North Franklin Street
Wilkes-Barre, Pa 18701

April 14, 2020

Attorney Opiel, As for the request to have my son Corbin L. Kauffman
Move home to help his father, due to a recent Kidney transplant.
We were informed, all guns were to be removed from our residence.
540 Paddletown Road, Etters, Pa 17319.

Guns to include rifles and one Handgun were moved to 545 Paddletown Road. Etters, Pa
On the same street we live, To Donna Hake's house the Sister of Corbin. Corbin does not
Visit nor does he have access to Donna Hakes Property. The guns are locked in Donna's attic.
Corbin has no knowledge of where the Gun's are located.

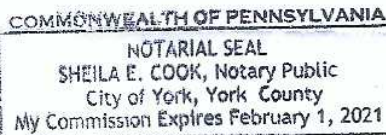
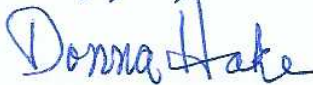
For the record, Corbin never had an interest in shooting guns or hunting. As for the gun (By the FBI)
Taken from our home it was new and laying in the box and he picked it up and took a photo.
Our guns are never out in the open to give access to any one. For we have grandchildren.
So as of the time that Corbin will be in our house they will be locked at 540 Paddletown Road.
With only one having the key to the attic is The Gun owner Neal Kauffman and Homeowner,
Donna Hake, Sister of Corbin.

Questions Please contact, Neal Kauffman @717 309-5526 Donna Hake 717 717 659-6308.

Signed: Neal Kauffman, Gun Owner and Father



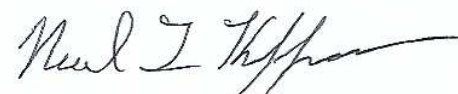
Donna Hake, Sister and Homeowner of the gun storage.




April 17, 2020

As requested list of firearms moved to 545 Paddletown Road, Etters Pa 17319

<u>Make</u>	<u>Serial#</u>	<u>Model</u>
Taurus 9mm	TJX56038	PT III G2
Mossberg 12 GA	U0855541	500
Mossberg 12 GA	R03045	500
Mossberg 20 GA	P914404	500
Traditions .45 CA	14-13-045297-02	E-BOLT 209
Marlin Cal 22 LR	98674883	25N
Remington .223	7783555	7
Remington .270	C6837390	700
Winchester .22 Win Mag	F574350	9422


 540 Paddletown Rd
 Etters PA 17319


 4-17-2020

Commonwealth of Pennsylvania - Notary Seal
 WILLIAM H. BROWNSTEIN, Notary Public
 York County
 My Commission Expires March 22, 2024
 Commission Number 1018796